

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed:

Name of company covered by this certification: West Central Pagers, Inc.

Form 499 Filer ID: 821912

Name of signatory: Judy Marckres

Title of signatory: President

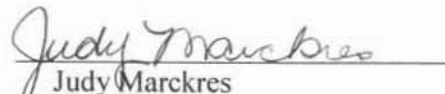
I, Judy Marckres, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps the companies are taking to protect CPNI are described in the accompanying statement.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.

Signed:

  
Judy Marckres  
(electronic signature)

**WEST CENTRAL PAGERS, INC.**  
**CUSTOMER PROPRIETARY NETWORK INFORMATION**  
**COMPLIANCE PROCEDURES**

West Central Pagers, Inc. ("West Central") has established the following procedures for ensuring compliance with 47 C.F.R. § 64.2001 *et seq.* concerning use of customer proprietary network information ("CPNI"):

1. West Central rarely receives customer inquiries regarding billing or accounts, since all customers pay a uniform, flat service fee every month. Nevertheless, if a person were to request CPNI, either in person or by telephone, West Central would seek verification from the person making the request to confirm that such individual is indeed the customer to whom the CPNI relates. If the request for CPNI is made in person, the West Central representative who receives the request will require the individual making the request to produce a valid photo ID that matches the account information for the customer to whom the CPNI relates. If the CPNI request is made by telephone, the West Central representative who receives the request must either request an account password or mail the CPNI to the customer's address of record. West Central does not provide any online access to CPNI.
2. Except as expressly authorized under 47 C.F.R. § 64.2005 or with a customer's approval, it is West Central's policy not to use CPNI. In addition, it is currently West Central's policy not to disclose or permit access to CPNI by any affiliate or third party, or to engage in any third party sales or marketing campaigns that involve the use of CPNI. If West Central engages in any such activities in the future, it will ensure that it complies with the requirements set forth in 47 C.F.R. §§ 64.2007, 64.2008, 64.2009, and 64.2010.
3. West Central will immediately notify a customer whenever a password, customer response to a back-up means of authentication for passwords, or address of record is created or changed, as required by 47 C.F.R. § 64.2010(f). Such notification will be made by a message to the telephone number of record or by mail to the customer's address of record.
4. West Central will notify law enforcement and affected customers of a breach of a customer's CPNI as provided in 47 C.F.R. § 64.2011, and will maintain a record of any breaches discovered or notifications made pursuant to that section.
5. All West Central representatives who handle customer inquiries and requests are trained as to when they are and are not authorized to use CPNI. West Central maintains written confirmation that each representative has received such training, and has established a disciplinary process for any unauthorized use of CPNI, all as required by 47 C.F.R. § 64.2009(b).